

### **AGENDA**

- 1. Safety Moment**
- 2. Purpose and Meeting Goals**
- 3. 2016 RI/FS Accomplishments**
- 4. Description of ARC's Schedule Projection Process**
- 5. ARC's Concerns with EPA's Proposed Schedule**
- 6. Recommendations and Schedule Consensus**

### **MEETING PURPOSE**

- ARC requested this meeting with EPA management to try to reach resolution on the Leviathan RI/FS schedule. EPA and ARC have been working together for some time to refine and accelerate the schedule for RI/FS planning, sampling, data analysis, and reporting, including the human health and ecological risk assessments. Substantial progress has been made, and much of the RI field work and data collection is now finished. But there remains disagreement on the time and sequence of events required for completing this process.

- Based on a thorough analysis of the remaining tasks, ARC presented a completion schedule in June 2016 that calls for submittal of: (i) the draft RI report by December 31, 2017; (ii) the draft risk assessment reports by June 30, 2018; and (iii) the draft FS report by December 31, 2018. While these submittal dates are sequential, work on each component is proceeding concurrently. Even though some work requirements have been added by EPA, this schedule is essentially the same as what we presented in the January 19, 2016 meeting, which EPA management accepted.

- EPA continues to press for a more aggressive schedule requiring submittal of: (i) the draft RI/FS (including risk assessments) by December 31, 2017; and (ii) a final RI/FS by August 30, 2018. EPA asserts that its proposed schedule can be achieved by ensuring an agreed upon format, consolidated completion of field efforts, timely review, presentation and use of collected data, and parallel completion of the RI, risk assessments, and FS. Unfortunately, attempts by EPA to streamline the process by directing change and adding new deliverables, as well as the lengthy time for EPA document reviews, create a constant flux, add time to the process, and jeopardize ARC's ability to achieve even its own proposed schedule.

- ARC believes that EPA's proposed schedule fails to account for the time needed to complete key steps in the RI/FS process in the proper sequence, including agreement on reference concentrations before completing site characterization; agreement on site characterization before defining exposure areas (EAs) and exposure point concentrations (EPCs); agreement on EAs and EPCs before completing the risk assessments; and agreement on remedial action objectives and potential remedial alternatives before completing the FS.

- ARC's schedule is already highly compressed and based on aggressive assumptions. The schedule won't improve simply by devoting more resources to what is an incredibly large effort, involving dozens of professionals, and a project cost in the tens of millions of dollars. Rather, it is a function of data availability, the time required to thoroughly and competently analyze a tremendous amount of information, and the need to complete certain analyses and tasks before others can begin.

- ARC is even more motivated than EPA to complete the RI/FS as soon as possible, but we cannot agree to a schedule that we know is not achievable and that will compromise proper analysis of the data. We hope this meeting can be used to reach consensus on a schedule that ensures the timely completion of this process in a scientifically valid manner.